

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

VALASSIS NSA

Docket No. MC2012-14

VALASSIS NSA

Docket No. R2012-8

**NEWSPAPER ASSOCIATION OF AMERICA
MOTION FOR EXTENSION OF TIME FOR RESPONSE TO
NOTICE OF INQUIRY NO. 1
(June 19, 2012)**

The Newspaper Association of America (“NAA”) hereby moves for an extension of time until June 29, 2012, in which to respond to Commission Notice of Inquiry No. 1.

The Commission issued NOI No. 1 late on Friday, June 15. The NOI invites comments from all interested parties on eight questions, some with subparts. The NOI also specifically addresses two additional questions to opponents of the Postal Service’s proposed negotiated services agreement (“NSA”) with Valassis, such as NAA and its member newspapers, and two questions specifically to the Postal Service.

This proceeding is unusual in that more than 30 newspapers filed comments. Certain of the questions in the NOI ask for specific, detailed information from those newspapers that is not readily available.¹ These

¹ NOI Question 9 asks newspapers to state the portion of annual advertising revenue for the last two fiscal years comprised of retail advertising of durable and semi-durable goods sold by companies that operated in 30 or more states, such as the advertising targeted by the NSA. Question 10 asks for the number of pieces and total postage pounds of TMC advertising inserts

questions asked by NOI No. 1 require newspapers to review a number of records going back several years. These are records not readily available to a busy advertising department on short notice.

Also, NAA has been advised that some of the information asked by NOI No. 1 is not necessarily maintained in a manner that would facilitate an easy or ready response. For example, newspapers do not track the number of states in which their advertisers do business, although they are certainly aware, of course, that companies such as Walmart, Best Buy, and J.C. Penney have stores across the nation. It is unclear whether information can be obtained in the form that the NOI requests, but it is clear that many individual newspapers would have great difficulty locating that information by June 22.

In light of the importance of this proceeding, NAA respectfully requests the Commission to extend, until June 29, the deadline for responses to the NOI. NAA does not believe that this slight extension will prejudice any parties.

displaying durable and semi-durable goods sold by companies operating in 30 or more states and how it was distributed during the last 12 months.

CONCLUSION

For the foregoing reasons, the Newspaper Association of America, on its behalf and on behalf of its member newspapers, respectfully request an extension of time until June 29, 2012 for responses to Notice of Inquiry No. 1.

Respectfully submitted,

Newspaper Association of America

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